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**Proctor**

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JUN 18 1997

Federal Communications Commission  
Office of Secretary

June 13, 1997

DOCKET FILE COPY ORIGINAL

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington DC 20554

Dear Mr. Caton:

This letter constitutes notice that Proctor & Associates is submitting as ex parte in reference to FCC reconsideration of Docket 94-102, related to the topic of Wireless 9-1-1. This submission is pursuant to Sec 1.1206 of FCC regulations.

Proctor & Associates has been actively involved in Enhanced 9-1-1 for over 20 years, having developed, manufactured, and delivered useful, high quality products to the telecommunications industry for that entire period. We are proud of the fine reputation earned by our 9-1-1 product line, which includes:

- PSAP ANI controllers, which receive the incoming calls and associated calling numbers for delivery to other data processing equipment in support of Enhanced 9-1-1 operation
- Automatic network backup systems to monitor the 9-1-1 network and prevent telephone outages from impacting the flow of 9-1-1 traffic, a benefit in direct support of the FCC's National Reliability Council recommendations
- PBX station identification systems which pin-point the location of 9-1-1 callers and speed the response to emergencies
- Cell-Link™, Proctor & Associates' new system, which addresses the issues of the referenced FCC Docket 94-102

Proctor & Associates supports the FCC in its efforts to bring effective emergency telephone service to wireless subscribers, as wireline subscribers have enjoyed for many years. We see much evidence that the FCC rulemaking in Docket 94-102 has been extremely effective in causing the wireless industry, the public safety community,

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Mr. William Caton  
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local exchange carriers, and suppliers to implement solutions to the wireless 9-1-1 problem.

Proctor & Associates' Cell-Link solution to the Phase 1 requirements of providing a call-back number and identification of the originating cell-site and sector was developed early in 1996 and successfully field-trialed in a working cellular environment late last year. As detailed in the attached material, our Cell-Link product completely satisfies the Phase 1 requirements of ANI and cell-site/sector delivery to the PSAP in a cost-effective manner.

Furthermore, this system, under U S West's trade name *CELLTRACE*, is available today in the state of Washington and soon will be throughout U S West's region. In fact, wireless callers on the AirTouch network in the Vancouver, WA area are presently receiving the advanced 9-1-1 service made available by *CELLTRACE*.

It is important to note that other firms, competitive with us, have also announced similar approaches to the problem. This is further evidence of the broad availability of Phase 1 solutions to any public safety administrations which desire them.

We strongly urge the FCC to keep the public interest in mind during any reconsideration of Docket 94-102 and not delay the deadline for implementation of the Phase 1 functionality. Our reasons for this position are:

1. Public safety is improved with the implementation of this technology. In its absence, wireless 9-1-1 calls may be misrouted to the wrong PSAP, are not accompanied by a valid number for callback, and contain no information on the approximate point of call origination. The Phase 1 solution delivers all of these important features and allows wireless subscribers to realize the safety benefits they expect.
2. The positive influence of the FCC should be maintained. Docket 94-102 has encouraged product development to proceed and has stimulated public safety jurisdictions to establish funding mechanisms. Any delay in the Phase 1 date would confuse the industry and the public, undermining the significant progress already made.
3. The available Phase 1 technology is cost-effective, being based at the LEC's tandem switch, rather than at the much more numerous cell-sites. This type of solution makes prudent use of 9-1-1 funds while various technologies for satisfying the Phase 2 requirements are investigated.

Mr. William Caton  
Federal Communications Commission  
June 13, 1997  
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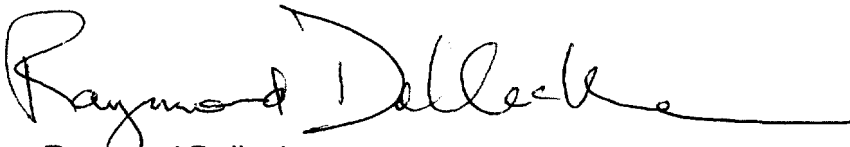
4. The available Phase 1 technology uses widely available trunk types and preserves existing PSAP equipment. Since PSAPs are not required to rearrange their current systems, implementing this solution is practical within the Phase 1 deadline.

Therefore, the Phase 1 deadline of April 1, 1998, should be maintained in any reconsideration of the rules. In support of our submission, we enclose the following documents:

1. Joint press release, U S West, SCC, and Proctor & Associates
2. Cell-Link system overview, Proctor & Associates
3. Cell-Link product brochure, Proctor & Associates
4. *CELLTRACE* tariff, U S West, State of Washington

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond Dellecker", with a long horizontal flourish extending to the right.

Raymond Dellecker,  
National Marketing and Sales Manager

cc. Ms. Jackie A. Neva, Director, Solutions Development, U S West

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For More Information:

Kay Zimmerli  
U S West Communications  
503-425-3321



Thera Bradshaw  
Clark Regional 9-1-1 Center  
360-737-1911 Ext. 3948



Ray Dellecker  
Proctor & Associates  
425-881-7000



Nancy Miller  
SCC Communications Corporation  
303-581-6498



## **U S WEST Installs First Commercially Available Cellular 9-1-1 System**

*Proctor Cell-Link™ Cellular Identification System Dramatically  
Improves 9-1-1 Service for Cellular Callers,  
SCC Provides Call Routing and Delivery of Integrated ALI Data*

Portland, Oregon, June 16, 1997—An important new service to automatically identify wireless 9-1-1 callers was activated on June 6 by U S WEST. The service, called CELLTRACE™, is presently delivering 9-1-1 traffic from the AirTouch cellular network into the Clark County, Washington emergency communications system. CELLTRACE™, which was field trialed late last year, enables emergency dispatchers to identify 10-digit telephone numbers from cellular 9-1-1 callers. This implementation meets the recently mandated FCC Phase I requirements to provide improved 9-1-1 service to wireless callers by April 1998.

Prior to introducing this new technology, unlike calls from a home or business phone, when a cellular phone caller dialed 9-1-1, the emergency dispatcher would not automatically receive the caller's phone number, name or any location information. If a caller was disconnected or hung up, the dispatcher had no way of reconnecting to the 9-1-1 caller.

The Clark County installation marks a major breakthrough in 9-1-1 technology because it gives cellular customers access to enhanced 9-1-1 features for the first time. "With 20% of our 9-1-1 calls coming from cellular customers, we decided to implement this new service now, rather than wait for the April 1998 deadline," said Thera Bradshaw, Director of Clark Regional Communications Agency. "Clark County, U S WEST, SCC, and Proctor teamed together to make this service a reality for AirTouch customers 10 months before the FCC deadline."

-more-

The technology integrates emergency cellular calls into the existing 9-1-1 network. One of the primary benefits of this solution is that it is compatible with nearly all of the existing 9-1-1 call-handling network and 9-1-1 dispatch centers.

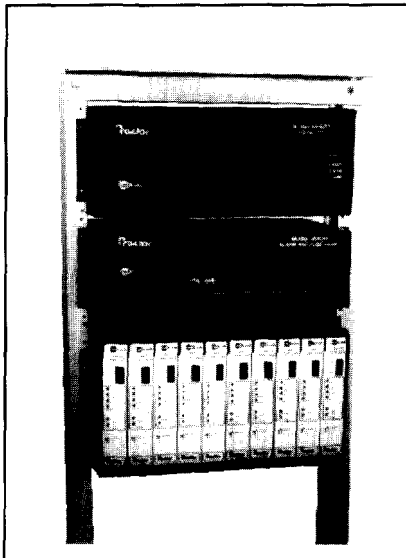
CELLTRACE™ will be available soon, throughout U S WEST's 14 state region (*please consult with your local U S WEST representative for specific availability*). The service uses Proctor & Associates' Cell-Link™ which passes the cell site ID through the existing 9-1-1 network to the Public Safety Answering Point (PSAP). Simultaneously, Cell-Link™ can transmit the caller's 10-digit telephone number and cell site to U S WEST's database of subscriber information managed by SCC on their SR/ALI (Selective Routing/Automatic Location Identification) platform, ensuring that the data presented to the 9-1-1 call taker is complete and correct. This allows the dispatcher to identify, locate, and call back the caller if disconnected, even when "roaming."

#### **THE ROLES OF U S WEST, CLARK COUNTY, PROCTOR AND SCC**

- U S WEST is in the connections business, helping customers share information, entertainment and communications services in local markets worldwide. The company's major subsidiary, U S WEST Communications, provides telecommunications services to more than 25 million customers in 14 western and midwestern states. Providing the 9-1-1 network services over 13.8 million access lines, U S WEST Advanced Technologies initially developed the concept for this technology. U S WEST serves over 400 E9-1-1 Public Safety Answering Points in its 14-state region.
- Clark Regional Communications Agency receives all 9-1-1 calls from the 310,000 citizens in the county, including the cities of Vancouver, Battle Ground, Camas, LaCenter, Ridgefield, Washougal and Yacolt, Washington. Clark County's Thera Bradshaw, an active member of NENA and APCO, provided insight and suggestions during the development and testing phases. The agency answers an average of 1,000 calls daily. Approximately 13% of those calls are from cellular phones.
- Proctor & Associates is a leading manufacturer of telecommunications equipment, including all segments of the 9-1-1 network, from call control and processing, to network backup and PBX station ID. During the trial, the Cell-Link™ equipment was installed between an existing wireless switching office and the U S WEST 9-1-1 network.
- SCC Communications Corporation, a privately held company, has been serving the public safety industry since 1985. They offer a complete suite of products and services that provide 9-1-1 solutions to telecommunications providers. The SCC CellALI wireless 9-1-1 solution provides proper 9-1-1 call routing and delivery of integrated ALI information to public safety answering points.

## Cell-Link 9-1-1 Cellular ID System

- **Routes 9-1-1 calls to the correct PSAP**
- **Provides a full call-back telephone number, including area code—even if roaming**
- **Forwards caller's approximate location to the PSAP**



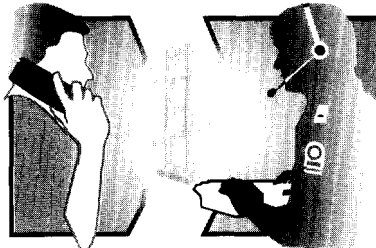
### Cell-Link FEATURES

- Works with existing 9-1-1 systems—no expensive changeouts or upgrades.
- Can forward the caller's Cell-Site ID to the PSAP.
- Detailed call activity and system status/alarm reports.
- Virtually unlimited trunk capacity. Serves multiple wireless carriers—Cellular and PCS.
- Remote programming/maintenance port (password protected).
- Optional system redundancy.

Federal Communications Commission

Office of Secretary

## Bridging the Gap Between Wireless and Enhanced 9-1-1



The Model 45699 Cell-Link 9-1-1 Cellular Identification System dramatically improves 9-1-1 service for cellular and PCS callers by integrating wireless telephone systems into the 9-1-1 network, giving the callers complete, unrestricted access to Enhanced 9-1-1 services.

Prior to Cell-Link, two major limitations impeded the callers' access to Public Safety Answering Points (PSAPs). The first could cause wireless calls to be routed to the wrong PSAP. The second problem prevented the dispatcher from calling back the caller whenever they became disconnected. This call-back problem was caused by the unavailability of the wireless caller's phone number.

### Solves the Call-Routing and Call-Back Problems

Cell-Link solves both the call

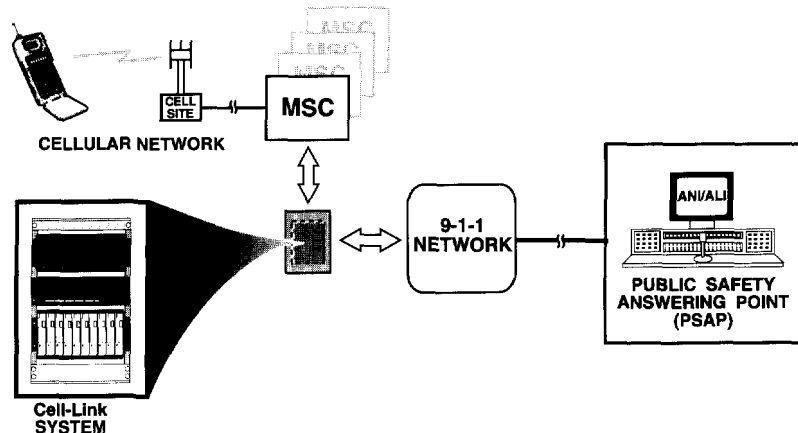
routing and call-back problems, giving wireless subscribers the E9-1-1 security they expect and deserve. The System is installed between the wireless switching office and the telephone company's 9-1-1 network to provide the caller's telephone number, including area code, and ID number of the antenna site routing the call. This data is forwarded with the 9-1-1 call to the appropriate PSAP. As a result, the 9-1-1 dispatcher can identify, locate, and call back the wireless caller—even when "roaming".

### Works with Existing 9-1-1 PSAP Systems—Cost Effective Solution to FCC Phase 1 Rules

Cell-Link is a modular, extremely cost effective system that works with existing 9-1-1 PSAP systems. It meets all applicable regulatory requirements, including the new "Phase 1" FCC rules for wireless 9-1-1 and the stringent standards set by Proctor for all of its 9-1-1 telecommunications products.

For more information, contact Proctor in Redmond, Washington at (800) 824-9719.

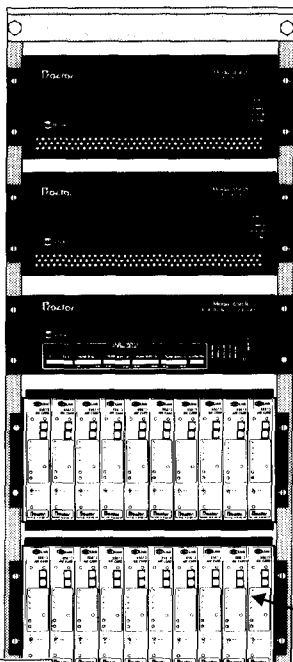
### TYPICAL Cell-Link INSTALLATION



Cell-Link is a trademark of Proctor & Associates, Inc.

### Model 45699 Cell-Link SYSTEM COMPONENTS

#### FULLY EQUIPPED And REDUNDANT CONFIGURATION



#### • DIGITAL IFC UNIT

Controls all data processing functions, monitoring activity, and alarms.

When dual IFCs are used, intercommunication between the two units assures each unit is automatically updated with matching programming configurations and station translation tables. LEDs indicate status of software intercommunication.

#### • ALARM-INTERCONNECT-FUSE PANEL

Performs all local and remote alarm reporting functions via visual LED indicators and an RS232 port. Provides fusing and 48VDC power distribution for the System.

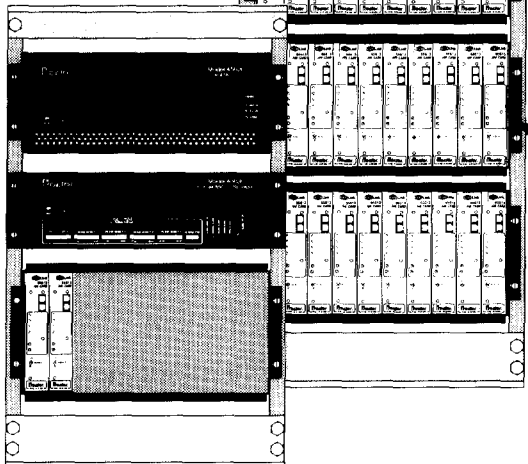
#### • ANI TRUNK CARD

Processes incoming cellular 9-1-1 calls, establishes the voice connection between the 9-1-1 caller and the PSAP operator, and transmits the ANI and routing numbers to the E9-1-1 network.

#### • TRUNK SHELF

Each prewired enclosure holds up to ten ANI Trunk Cards.

#### MINIMUM CONFIGURATION



### Cell-Link SPECIFICATIONS

#### • ELECTRICAL

Operating Voltage . . . . . -44 to -56 VDC  
Operating Current:  
Digital IFC . . . . . 0.5 Amps  
Alarm-Interconnect-Fuse Panel . . . . . 0.375 Amps  
Trunk Card . . . . . 0.350 Amps

#### • ENVIRONMENTAL

Operating Temperature . . . . . 0 to 40°C  
Storage Temperature . . . . . -20 to 85°C  
Relative Humidity . . . . . 0% to 95% (non condensing)

#### • FCC Part 15 Registered

#### • DIMENSIONS and WEIGHTS

**45613 Trunk Card:**  
8.25" H x 1.63" W x 9" D . . . . . Wt: 3.2 lbs

**45620 Digital IFC:**  
7" H x 19/23" W x 10.5" D . . . . . Wt: 12.4 lbs.

**45630 Alarm-Interconnect-Fuse-Panel:**  
5.25" H x 19/23" W x 12" D . . . . . Wt: 7.1 lbs.

**45650 Trunk Shelf:**  
10.5" H x 19/23" W x 11.2" D . . . . . Wt: 57 lbs (Full)

#### • Rack Mounting (19" or 23")



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JUN 18 1997

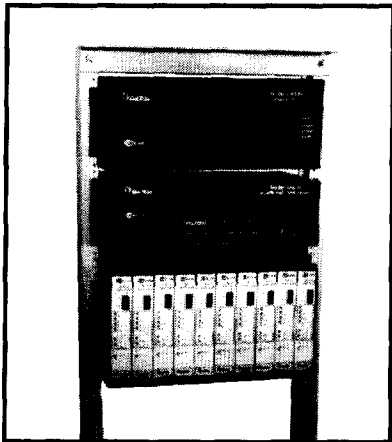
Federal Communications Commission  
Office of Secretary**CellLink™**  
System Overview

## WIRELESS 9-1-1: The Cell-Link™ Solution

### Background

For many years, the public safety community has encountered difficulty providing the same level of service to people dialing 9-1-1 from wireless telephones as from conventional phones. Unlike calls placed from wireline instruments, cellular and PCS telephone calls are usually not accompanied by a valid callback number which would enable the 9-1-1 call taker to re-establish a call if it is disrupted for any reason. Also, wireless 9-1-1 calls have carried no information pertaining to the location of the source of the call, consequently, calls were often routed to the wrong public safety agency, and 9-1-1 dispatchers often routed emergency services to the wrong location.

Recently, the Federal Communications Commission and at least one state legislature have taken action to resolve this disparity. Under the FCC Report and Order 94-102, wireless calls must be accompanied by a valid 10-digit callback number and must include location information to enable the public safety personnel to provide the proper response. The FCC rule requires that, by April 1, 1998, the location data transmitted to the Public Safety Answer Point (PSAP) must include the cell site and/or sector of the call origination. By October 1, 2001, the location of the caller must be identified to within 125 meters, 67% of the time. The FCC requirements are subject to two other considerations, the ability of the PSAP to receive the new data and the existence of cost-recovery mechanisms to pay for the added infrastructure.



Cell-Link Minimum Configuration

Proctor & Associates developed the Cell-Link system to allow wireless carriers and local exchange carriers to provide the improved service to their subscribers in the most cost-effective manner possible. The system fully satisfies the immediate requirements (Phase I) of the FCC Report and Order and provides a smooth migration for supporting the more exacting future technology.

Proctor & Associates is located in Redmond, Washington, and has been a leader in 9-1-1 for over 20 years. We have earned a superior reputation as a provider of cost-effective 9-1-1 solutions, including network backup systems, PBX station locating products, PSAP call answering equipment, and Cell-Link.

### Present Wireless 9-1-1 Situation

Until now, when a cellular or PCS subscriber dials 9-1-1, the call very likely would arrive at a PSAP with inadequate information for the call-taker to properly respond. In many cases, making matters worse, the call could be directed to an inappropriate PSAP, one which is not in the vicinity of the caller. These shortcomings are due to the limited provision for communication between the wireless and 9-1-1 networks.

Cell-Link™ is a trademark of Proctor & Associates, Inc.

Proctor & Associates • 15050 NE 36th St. • Redmond, WA 98052  
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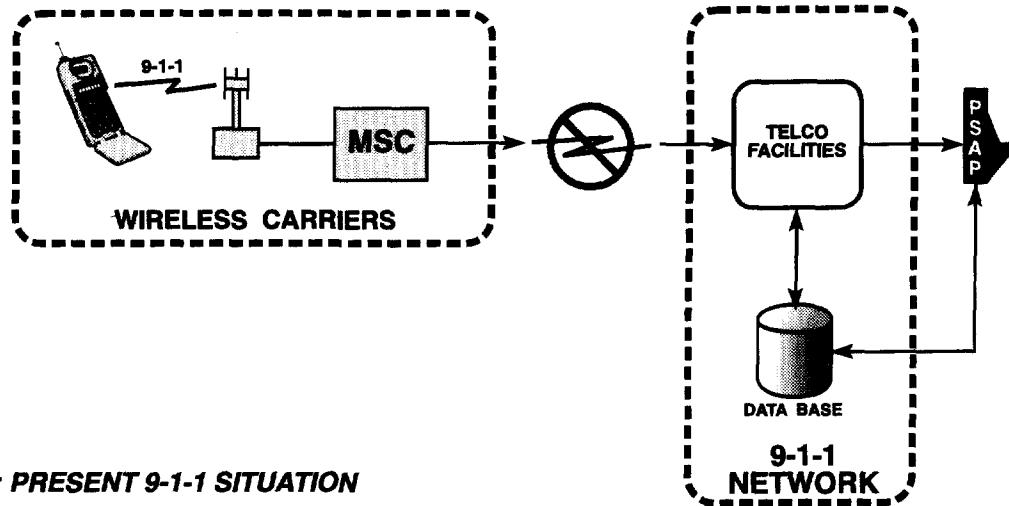


FIGURE 1: PRESENT 9-1-1 SITUATION

The facilities between the wireless carrier and the landline telco were incapable of passing the detailed information necessary to convey a wireless caller's phone number or location. The difficulty is intensified by the wireless feature of roaming, whereby a caller from a distant area code may be calling 9-1-1 in the local vicinity. In this case, the PSAP would need to know the caller's full 10-digit, not just a 7-digit number as is customary on landline calls.

Also, with the entry of many new wireless carriers as a result of the FCC auctions for PCS frequency allocations, PSAPs face an exponentially more difficult job of handling the traffic from diverse sources.

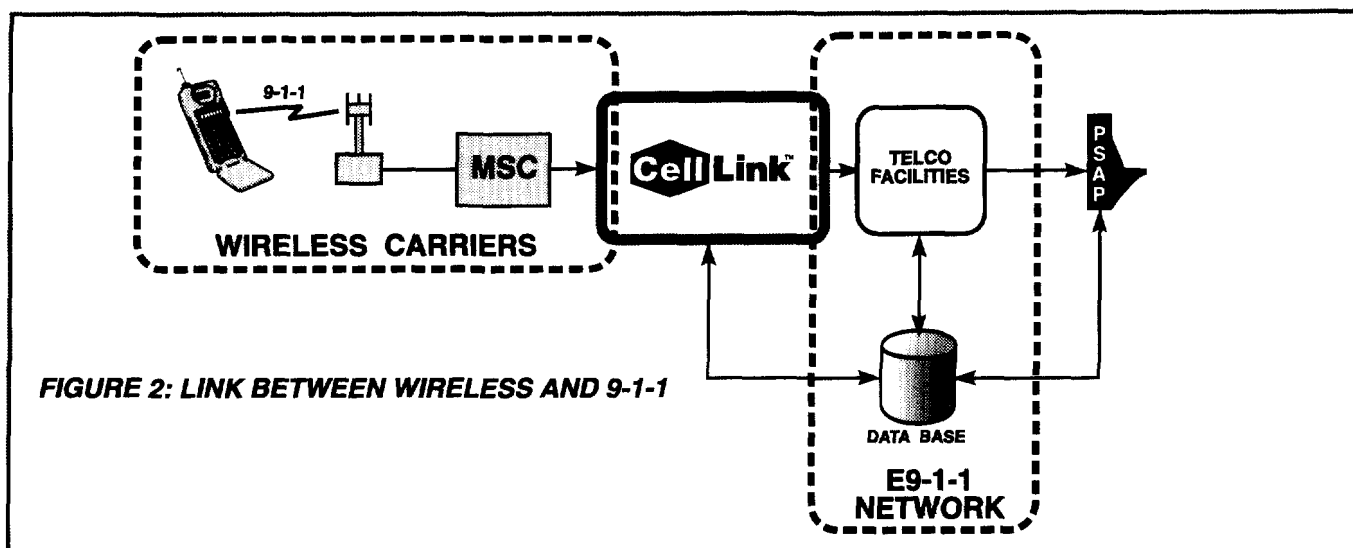
A solution is needed which bridges the gap between the wireless networks and the 9-1-1 networks. The required capabilities are:

- *Minimal impact on existing infrastructure, in both the wireless and 9-1-1 facilities*
- *Compliance with FCC ruling*
- *Minimal difference at the PSAPs in the handling of wireless and wireline calls*
- *Cost-effectiveness and flexibility to fit into a wide variety of network environments, including the possibility of many wireless carriers and a variety of in-place PSAP call answering systems*
- *CO-grade equipment for high reliability and compatibility with existing maintenance and administration systems*
- *Able to support future locating technologies when they become available and cost-effective*

The Proctor Cell-Link solution meets these requirements—today.

### Link Between Wireless and 9-1-1

Cell-Link bridges the gap between the two diverse networks, allowing wireless 9-1-1 calls to flow smoothly through the Enhanced 9-1-1 network to the PSAP. It is compatible with the existing networks and PSAPs, avoiding need for modifications at the PSAP. Cost-effectiveness is assured by utilizing the in-place facilities and through a modular design allowing the system to be sized as needed for the specific application.



This drawing shows calls from the wireless carriers being transported over standard Feature Group D trunks from multiple Mobile Switch Centers (MSCs) to the Cell-Link system, which is typically installed in the telephone company's 9-1-1 tandem office. By centralizing the system at the tandem switch, Cell-Link can handle communications from multiple MSCs and multiple wireless carriers. Up to 20 MSCs per processor are supported. Alternatively, Cell-Link, in a reduced configuration, may be implemented at the MSC.

The caller's phone number and an identifying number for the cell site and sector are passed over the FGD trunks to Cell-Link. Then, using standard CAMA trunks, Cell-Link transmits the call forward to the existing 9-1-1 facilities. The call is routed to the proper PSAP, based upon the physical location of the cell site and sector where the call originated.

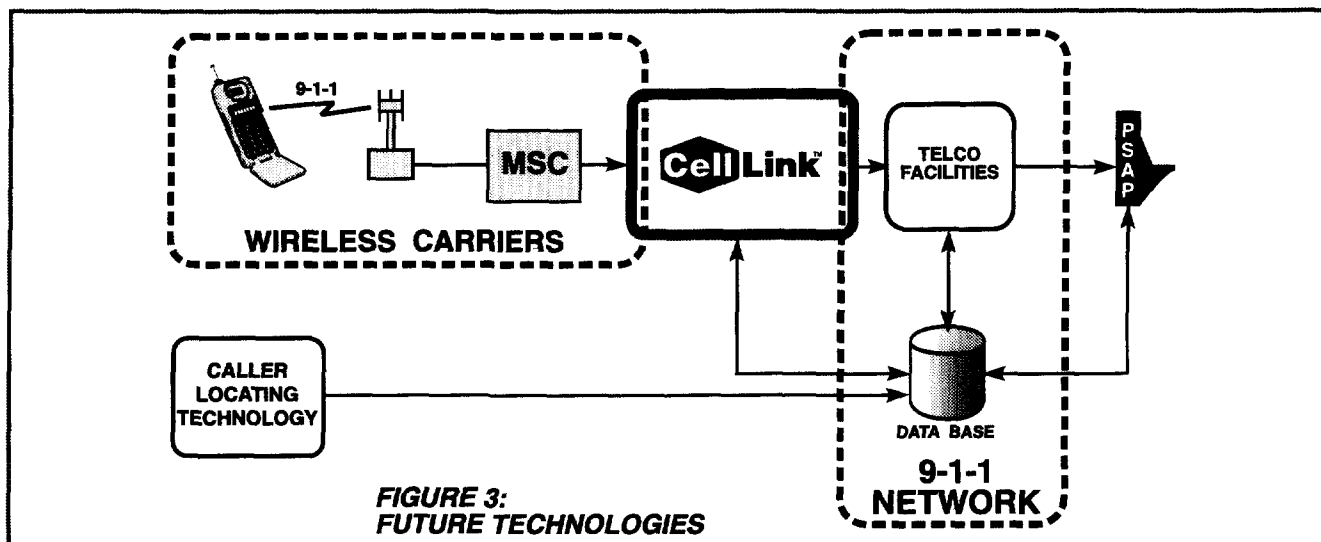
Simultaneously with the call being transported to the PSAP, the associated call data is sent to the ALI data management system and stored dynamically. When the PSAP ALI request is made, the record which is sent back to the PSAP includes the caller's 10-digit phone number and the address of the cell-site.

Another important benefit of the Cell-Link solution results from using the existing 9-1-1 infrastructure to the greatest extent possible. All of the safeguards that have been built into 9-1-1 service over the years are now available on wireless—for example, a call won't get separated from its data even if it has to be re-routed or transferred to a different PSAP.

## Future Technologies

For the future, as networks gradually upgrade with new trunk protocols (ISDN, Signaling System 7, etc.), Cell-Link will remain the most cost-effective transport means for wireless 9-1-1. The Cell-Link architecture supports future interfaces as necessary through its use of modular design. The system structure remains intact and viable, supporting multiple wireless carriers and interfacing into the telephone company's management system.

Locating technologies are also expected to undergo significant changes in the future. Details of these future implementations are not clear at this time, but regardless of the methods that will become practical, they can be added to the Cell-Link approach as an add-on to the initial deployment.



In the illustrated implementation, Cell-Link continues to carry 9-1-1 calls from the wireless provider to the 9-1-1 network while a supplemental source supplies precise location data. As depicted, the location system output, which might consist of x-y coordinates, is sent to the ALI data base for conversion to address and matching with the individual call. Conversely, the location system output could also be directed to the MSC and then transported by Cell-Link to the 9-1-1 network.

## Availability

The Cell-Link system has been extensively tested and field-proven. It is now deployed in the 9-1-1 network as part of a tariffed service offering by a Regional Operating Company.

Proctor & Associates can provide systems for immediate implementation or trial purposes. Cell-Link pricing, which is dependent upon the configuration employed, is extremely attractive and assures you of great value for your investment.

U S WEST Communications  
1600 Bell Plaza, Room 3204  
Seattle, Washington 98191  
206 345-2002

C. Scott McClellan  
Vice President - Washington

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COMMUNICATIONS @

Federal Communications Commission  
Office of Secretary

March 11, 1997

Advice No. 2844T

Office of the Secretary  
Washington Utilities and  
Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

Dear Mr. McLellan:

U S WEST Communications, Inc. (USWC) is forwarding for filing the sheets listed on Attachment A.

This filing introduces a service for E911 customers called CELLTRACE. CELLTRACE provides for the routing of a wireless (i.e. cellular) dialed 911 call, based on the geographic coverage of a wireless antenna site (cell site), to the appropriate Public Safety Answering Point (PSAP). In addition, upon completing the call to the PSAP, the cell site location and the caller's Mobile Directory Number (MDN) are displayed on the PSAP's Automatic Location Identification (ALI) display device.

Also, as a clean-up item, Emergency Reporting Telephone Equipment (ERPT) is being removed from the tariff with this filing. There are no customers currently subscribing to ERPT.

Supporting documentation for this filing is considered confidential to U S WEST, is stamped as such and should be protected under the provisions of WAC 480-09-015.

If you have questions concerning this filing, please contact Jane Nishita on (206)345-2316.

Yours very truly,

By Theresa A. Jensen  
Vice President

Attachments

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Attachment A  
Advice No. 2844TEXCHANGE AND NETWORK SERVICES  
WN U-31

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CANCELED SHEETEXCHANGE AND NETWORK SERVICES  
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**U S WEST COMMUNICATIONS, INC.**

WN U-31  
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WASHINGTON

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**U S WEST COMMUNICATIONS, INC.**

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Advice No. 2844T

Issued by U S WEST Communications, Inc.  
 By C. S. McClellan, Vice President

Effective: April 11, 1997

WA97-025

03/11 '97 13:09

**U S WEST COMMUNICATIONS, INC.**

WN U-31  
 EXCHANGE AND  
 NETWORK SERVICES  
 WASHINGTON

SECTION 1  
 3rd Revised Sheet 21  
 Cancels 2nd Revised Sheet 21

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(D)



**U S WEST COMMUNICATIONS, INC.**

**WN U-31  
EXCHANGE AND  
NETWORK SERVICES  
WASHINGTON**

**SECTION 1  
5th Revised Sheet 33  
Cancels 4th Revised Sheet 33**

**1. APPLICATION AND REFERENCE****1.7 TRADEMARKS, SERVICE MARKS AND TRADE NAMES**

Marks are identified in text throughout this document in all caps and italics, e.g., *CENTRON* Service.

| <b>MARK</b>                               | <b>OWNER</b>                               |     |
|---|--|-----|
| <b>CENTRAFLEX<sup>SM</sup></b>            | <b>U S WEST Communications, Inc.</b>       |     |
| <b>CENTRON<sup>SM</sup></b>               | <b>U S WEST Communications, Inc.</b>       |     |
| <b>CELLTRAC<sup>TM</sup></b>              | <b>U S WEST Communications, Inc.</b>       | (N) |
| <b>COMPLETE-A-CALL<sup>SM</sup></b>       | <b>U S WEST Communications, Inc.</b>       |     |
| <b>CONSULTLINE<sup>SM</sup></b>           | <b>U S WEST Communications, Inc.</b>       |     |
| <b>CUSTOMCHOICE<sup>SM</sup></b>          | <b>U S WEST Communications, Inc.</b>       |     |
| <b>CUSTOMNET<sup>SM</sup></b>             | <b>U S WEST Communications, Inc.</b>       |     |
| <b>DID<sup>SM</sup></b>                   | <b>U S WEST Communications, Inc.</b>       |     |
| <b>DIGICOM<sup>SM</sup></b>               | <b>U S WEST Communications, Inc.</b>       |     |
| <b>FINDMES<sup>SM</sup></b>               | <b>U S WEST Communications, Inc.</b>       |     |
| <b>HOME BUSINESS LINE<sup>SM</sup></b>    | <b>U S WEST Communications, Inc.</b>       |     |
| <b>INTRACALL<sup>SM</sup></b>             | <b>U S WEST, Inc.</b>                      |     |
| <b>MARKET EXPANSION LINE<sup>SM</sup></b> | <b>U S WEST Communications Group, Inc.</b> |     |
| <b>PC/PHONE<sup>SM</sup></b>              | <b>U S WEST Communications, Inc.</b>       |     |

**U S WEST COMMUNICATIONS, INC.**

WN U-31  
 EXCHANGE AND  
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 WASHINGTON

SECTION 9  
 5th Revised Index Sheet 1  
 Cancels 4th Revised Index Sheet 1

**9. CENTRAL OFFICE SERVICES**

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**U S WEST COMMUNICATIONS, INC.**

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EXCHANGE AND  
NETWORK SERVICES  
WASHINGTON**

**SECTION 9  
1st Revised Sheet 54  
Cancels Original Sheet 54[1]**

**9. CENTRAL OFFICE SERVICES**

(D)

[1] This sheet also cancels the following sheet:

(N)

1st Revised Sheet 55

(N)

Advice No. 2844T  
Issued by U S WEST Communications, Inc.  
By C. S. McClellan, Vice President  
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**U S WEST COMMUNICATIONS, INC.****WN U-31  
EXCHANGE AND  
NETWORK SERVICES  
WASHINGTON****SECTION 9  
Original Sheet 53.1****9. CENTRAL OFFICE SERVICES****9.2 EMERGENCY REPORTING SERVICE****9.2.1 UNIVERSAL EMERGENCY NUMBER SERVICE - 911****C. CELLTRACE****(N)****1. Description**

*CELLTRACE* is a service which provides the E911 customer the capability of receiving the ANI from a wireless handset for delivery to a PSAP. A call to 911 from a wireless handset is passed from the Wireless Switching Center (WSC) to the Company's selective routing switch on dedicated facilities. Upon completing the call to the PSAP, the cell site location and the number of the originating call are displayed on the PSAP's ALI display device.

**2. Definitions****ALI Delivery**

The process which delivers the ALI information including a unique seven-digit non-dialable number and the wireless handset's ANI to the PSAP through ports of the *CELLTRACE* Interface.

**Wireless Switching Center (WSC)**

A switch that manages facilities used to provide wireless two-way telecommunications services.

**CELLTRACE Interface**

A non-blocking trunk signaling device which automatically provides the PSAP with the caller's wireless handset ten digit ANI, the location of the cell site that originated the call and the name of the wireless service provider.

**3. Terms and Conditions**

- a. *CELLTRACE* is available to PSAP's with E911 when the Selective Routing and ALI features are purchased from the Company.
- b. Delivery of *CELLTRACE* to the PSAP requires specific entries in the E911 data base which will deliver the wireless cell site location from which the call originates.
- c. A minimum of two dedicated trunks is required between the WSC and the Selective Routing switch.

**U S WEST COMMUNICATIONS, INC.****WN U-31  
EXCHANGE AND  
NETWORK SERVICES  
WASHINGTON****SECTION 9  
Original Sheet 53.2****9. CENTRAL OFFICE SERVICES****9.2 EMERGENCY REPORTING SERVICE****9.2.1 UNIVERSAL EMERGENCY NUMBER SERVICE - 911****C.1. (Cont'd)**

- d. The E911 customer is responsible for providing the Company with a minimum of one unique seven-digit, non-dialable number which identifies a cellular site, a cellular face, or a cluster of cellular sites. (N)
- e. The E911 customer is responsible for determining call routing based on *CELLTRACE* and jurisdictional boundaries.
- f. *CELLTRACE* Rate Stability Plan

*CELLTRACE* may be ordered under a Rate Stability Plan Agreement (Agreement) for any term between 12 through 36 months. The Rate Stability Plan assures that during the term of the Agreement the monthly rates for *CELLTRACE* will not exceed the rates in effect at the time the Agreement is signed by the E911 customer, except where an increase mandated by a regulatory authority. The terms and conditions for the *CELLTRACE* Rate Stability Plan are as follows:

- (1) The minimum service period for any Agreement is 12 months.
- (2) Customers with *CELLTRACE* currently under a month-to-month payment option, may enter into an Agreement at any time.
- (3) *CELLTRACE* monthly rates provided under an Agreement will be those rates in effect at the time the Agreement is signed by the customer.
- (4) The monthly rates for *CELLTRACE* added to an existing Agreement are the rates in effect at the time of such addition.
- (5) If the stability plan rates are reduced in the Tariff, the rates under an Agreement shall also be reduced accordingly.
- (6) At the end of the term of an Agreement, the customer may enter into a new Rate Stability Plan, if such plan is offered by the Company; may convert to month-to-month rates; or may terminate *CELLTRACE*. Should the customer not make a choice by the end the term of the Agreement, customer's *CELLTRACE* rates will automatically revert to those in effect for the then current month-to-month pricing option. If *CELLTRACE* is continued under any *CELLTRACE* pricing plan, including non-stabilized month-to-month, nonrecurring charges will not apply.
- (7) The Rate Stability Plan is also subject to the terms of the Termination Liability/Waiver Policy set forth in 2.2.14.A.

## U S WEST COMMUNICATIONS, INC.

WN U-31  
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SECTION 9  
Original Sheet 53.3

## 9. CENTRAL OFFICE SERVICES

## 9.2 EMERGENCY REPORTING SERVICE

## 9.2.1 UNIVERSAL EMERGENCY NUMBER SERVICE - 911

## C. CELLTRACE (Cont'd)

## 4. Rates and Charges

(N)

|  | USOC  | NONRECURRING<br>CHARGE     | MONTHLY<br>RATE           |
|--|-------|----------------------------|---------------------------|
| a. CELLTRACE[1]                            |       |                            |                           |
| • CELLTRACE Interface,<br>per trunk/port   | 9AN   | \$439.95                   | \$177.55                  |
| • Selective Routing,<br>per incoming trunk | SR61X | <del>\$511.26</del><br>[2] | <del>\$33.16</del><br>[2] |
| b. Private Line Transport                  | [3]   | [3]                        | [3]                       |

\$951.21    \$210.71  
(NRC)    (Monthly)

Per trunk, excluding  
private line transport

[1] Both elements in a., must be purchased together.

[2] Same rates and charges as Selective Routing (USOC SR61X) found in B.4.i.

[3] Same terms, conditions, rates, charges and USOCs as DS1 Service found in the Private Line Transport Services Tariff.

# **WIRELESS 9-1-1 DOCKET 94-102**

## **EX PARTE FILING With The FEDERAL COMMUNICATIONS COMMISSION**

**Washington, DC  
June 18, 1997**

***Proctor & Associates  
Ray Dellecker  
National Marketing Manager  
425-881-7000***

Federal Communications  
Commission  
Office of Secretary

JUN 18 1997

RECEIVED

## **THE CURRENT SITUATION**

- **FCC Ruling on Docket No. 94-102 Effective Date is Oct. 1, 1996**
  - **Phase 1 Deadline: April 1, 1998**  
*Requires calling number and cell-site ID*
  - **Phase 2 Deadline: Oct. 1, 2001**  
*125 Meter accuracy—67% of the cases*
- **State of Washington SB 6265—Requires ANI for Wireless Calls as of Jan. 1, 1995**
- **RBOC/Proctor/SCC Cooperatively Developed the Cell-Link™ Solution**
- **Field Trial Conducted in Clark County, WA, Sept. 1996**
- **Tariff Approved April, 1997**



## Present Wireless 9-1-1 Situation

